

EXHIBIT 1

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Attorneys for Plaintiff Snap Inc.

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH**

SNAP INC., a Delaware corporation,

Plaintiff,

v.

DEREK E. BROWN, in his official capacity as
Attorney General of Utah,

KATHERINE HASS, in her official capacity as
Director of the Division of Consumer Protection of
the Utah Department of Commerce,

Defendants.

**DECLARATION OF NONA
YADEGAR IN SUPPORT OF
MOTION FOR *EX PARTE*
TEMPORARY RESTRAINING
ORDER AND ORDER TO SHOW
CAUSE WHY A PRELIMINARY
INJUNCTION SHOULD NOT ISSUE**

Case No. 2:25-cv-490

Judge: Jill N. Parrish

I, Nona Yadegar, declare as follows:

1. I am over 18 years of age and am competent to make this Declaration. I possess personal, firsthand knowledge of the assertions made herein—including from performing my job duties in the ordinary course of business.

2. I am currently employed as Director, Strategy and Operations at Snap Inc. (“Snap”). I have held this role since 2022. Prior to this role, I was the Director, Platform Policy & Social Impact, a position which I held for over four years. Before that, I spent two years as Snap’s Head of Trust and Safety, a position I held from the time I joined Snap in 2016 until the summer of 2018.

3. Snap’s flagship application is Snapchat, a camera and communications service that allows users to communicate with friends and family using text, audio and video calls, photos, and short videos. Snapchat is typically used for direct, private communications between small groups of people who already know each other in real life. By default, friendship on Snapchat is “bidirectional,” meaning that someone has to accept a user as a friend in order for a friend relationship to be formed.

4. Snapchat opens to the user’s camera and allows the user to send texts (called “chats”) and images (called “Snaps”) that delete by default after being opened. This default ephemerality feature is designed to mirror real-life interactions. It affords users a digital way to show a more authentic, unpolished, and spontaneous side of themselves. Since October 2013, users have been able to compile photos and videos into “Stories” generally available for 24 hours which, by default, are viewable only by a user’s friends. Through Snapchat’s “Discover” feature, users also have access to content from trusted partners (*e.g.*, NBC News) and popular creators. Snap also

more recently introduced “Spotlight,” a feature that allows users to make videos that, after vetting, can be more widely distributed.

5. When creating an account on Snapchat, users are required to provide their date of birth, as well as to provide either an email address or phone number. Individuals under age 13 are not allowed to create an account. If Snap learns that a registered user is under 13, it takes action to terminate the account and subsequently delete that user’s data.

6. Snap takes numerous precautions to protect minors aged 13 to 17 who use Snapchat. For example, minors can only receive direct messages from users with whom they are already friends on the platform or already have in their phone’s contacts. Snap empowers users to report harmful images or videos, and it employs technology to identify known illegal images and videos of child sexual abuse materials, which it then reports to the relevant authority. Snap also takes steps to safeguard the mental health of its users. For instance, in 2020, Snap launched Here For You which surfaces resources from expert organizations to Snapchat users when they search for a range of mental-health related topics.

7. In addition, Snap offers parents ways to gain insight into their teens’ use of the platform. Snapchat’s “Family Center,” a suite of parental controls launched in 2022, enables a parent or guardian to see which friends the teen has been recently communicating with on Snapchat, view their list of friends, restrict sensitive content, and report abuse. Family Center is designed to mirror the oversight that parents have over their teens’ actions in real life. For instance, parents typically know who their teen spends time with in-person, but they generally do not hear all the in-person conversations that their teens have with their friends.

8. One of the responsibilities of my current role is to work with cross-functional partners within Snap to understand current and potential regulatory obligations, whether and how they could apply to Snapchat, and what the impact could be. This includes legislation and regulation passed by the various states. In this regard, I work with various colleagues, including from Policy, Legal, Finance and Product.

9. Changing fundamental aspects of Snapchat—including how Snapchat’s users go about accessing content and what content they are exposed to—would alter core components of the app, and would consume substantial budget, resources, and staff.

10. Changing fundamental aspects of Snapchat—including how Snapchat’s users go about accessing content and what content they are exposed to—would also impede users’ (minors and adults alike) access to Snap’s services and their enjoyment of the ability to communicate with friends and family, and make those services less helpful and appealing to users.

11. For example, implementing different age verification requirements and/or age-related “guardrails” would require alterations to Snapchat’s code, and would require substantial time and resources. Depending on how it is implemented, it also threatens users’ ability to communicate with one another and access content.

12. I am informed and believe that the Utah Attorney’s General office has issued two subpoenas to Snap; the first of which related to compliance with Utah’s Consumer Sales Practices Act (“UCSPA”) and requested numerous documents related to Snap’s age verification processes and other features integral to how users communicate with friends and family (*e.g.*, ephemeral messages, Snap Streaks, My AI, and Snap’s recommendation algorithm), the second of which related specifically to compliance with the Children’s Online Privacy Protection Act (“COPPA”),

and both of which stated that failure to comply could result in a contempt or civil enforcement proceedings.

13. I am informed and believe that the Utah Attorney General sent Snap’s outside counsel an Enforcement Letter dated May 22, 2025, that asserts that Snap is in violation of the law and specifically references the Utah Consumer Privacy Act and COPPA.

14. I am informed and believe that during a conversation with the Utah Attorney General’s Office shortly after the letter was received, Snap’s representative was informed that the letter was a pre-litigation notice and that the Utah Attorney General also plans to file a civil action under the Utah Consumer Sales Practices Act (“UCSPA”).

15. A civil action by the Utah Attorney General’s Office and/or the Utah Division of Consumer Protection—even if ultimately found unconstitutional and in violation of federal law—will likely generate press releases and news coverage that harm Snap’s reputation, goodwill, and marketing potential.

* * * *

I declare under penalty of perjury under the laws of the United States of America, pursuant to 28 U.S.C. 1746, that the foregoing is true and correct to the best of my knowledge.

Executed this 20th day of June 2025, in Los Angeles, California.

/s/ Nona Yadegar*
Nona Yadegar

** e-signed with permission by
Matthew L. Lalli*

/s/Matthew L. Lalli
Matthew L. Lalli